

Ben F. Pierce Gore (SBN 128515)
PRATT & ASSOCIATES
1871 The Alameda, Suite 425
San Jose, CA 95126
Telephone: (408) 429-6506
Facsimile: (408) 369-0752
pgore@prattattorneys.com

Colin H. Dunn (Pro Hac Vice)
CLIFFORD LAW OFFICES, PC
120 North LaSalle, 31st Floor
Chicago, IL 60602
Telephone: (312) 899-9090
Facsimile: (312) 251-1160
chd@cliffordlaw.com

Attorneys for Plaintiffs

CARLA CHRISTOFFERSON (S.B. #161111)
cchristofferson@omm.com
ADAM LEVINE (S.B. #200522)
alevine@omm.com
KATE IDES (S.B. #274820)
kides@omm.com
DANIEL J. FARIA (S.B. #285158)
dfaria@omm.com
O'MELVENY & MYERS LLP
400 South Hope Street
Los Angeles, California 90071-2899
Telephone: (213) 430-6000
Facsimile: (213) 430-6407

RANDALL W. EDWARDS (S.B. #179053)
redwards@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111-3823
Telephone: (415) 984-8700
Facsimile: (415) 984-8701

*Attorneys for Defendant
Trader Joe's Company*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMY GITSON and DEBORAH ROSS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

TRADER JOE'S COMPANY,

Defendant.

Case No. 13-CV-1333 VC

CLASS ACTION

**STIPULATION & ~~PROPOSED~~
ORDER TO CONTINUE JUNE 26, 2014
HEARING ON DEFENDANT'S
MOTION TO DISMISS PLAINTIFFS'
THIRD AMENDED COMPLAINT AND
DEFENDANT'S MOTION TO
CERTIFY ORDER**

Hearing Date: June 26, 2014
Proposed Date: August 7, 2014
Time: 10:30 a.m.
Judge: Hon. Vince Chhabria
Action Filed: March 25, 2013

STIPULATION AND [PROPOSED] ORDER TO
CONTINUE HEARING ON MTD TAC &
MOTION TO CERTIFY ORDER;
CASE NO. 13-CV-1333 VC

Counsel for the parties jointly submit this Stipulation to continue the hearing date on Defendant's Motion to Dismiss Plaintiffs' Third Amended Complaint and Motion to Certify Order for Interlocutory Appeal and Motion to Stay presently scheduled on June 26, 2014, to August 7, 2014, or such other date as the Court orders. Colin Dunn, co-counsel for Plaintiffs who will be arguing in opposition to the Motions on behalf of Plaintiffs, has an oral argument set on June 26, 2014 before the Seventh Circuit Court of Appeals in *Junhong, et al. v. Boeing Company, 14-1825, et al* (consolidated appeal). Due to the schedules of the attorneys for both parties, the next Thursday they are available is August 7, 2014. The parties' positions regarding modifications to the case schedule are set forth in their Joint Case Management Statement (Dkt. # 89). Given this stipulation and request for a continued hearing date, Plaintiffs join in Defendant's position regarding pretrial dates set forth in ¶17.b of the Joint Case Management Statement. With that exception, the continuation of the hearing date stipulated to and requested herein will not have an effect of the parties' positions regarding modifications to the case schedule.

Dated: June 17, 2014

/s/ Colin Dunn

Counsel for Plaintiffs Gitson & Ross

Dated: June 17, 2014

/s/ Adam Levine

Counsel for Defendant Trader Joe's
Company

~~PROPOSED~~ ORDER

Good cause appearing therefor, it is hereby ordered that the hearing on Defendant's Motion to Dismiss Plaintiffs' Third Amended Complaint and Motion to Certify is continued to August 7, 2014, at 10:30 a.m.

10:00

IT IS SO ORDERED.

Dated: June 17, 2014



The Honorable Vince Chhabria
UNITED STATES DISTRICT JUDGE

ATTESTATION

In compliance with Local Rule 5-1(i)(3), the filer of this document hereby attests that the concurrence to the filing of this document has been obtained from the other signatories thereto.

/s/ Colin H. Dunn

Colin H. Dunn

CERTIFICATE OF SERVICE

I certify that a copy of this document was served electronically on June 17, 2014 on counsel of record in compliance with Federal Rule 5, Local Rule 5-6, by use of the Court's ECF system.

/s/ Colin H. Dunn

Colin H. Dunn